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21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **SAN FRANCISCO DIVISION**

24 IN RE: UBER TECHNOLOGIES, INC.,
25 PASSENGER SEXUAL ASSAULT
26 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S AUGUST 8,
2025 ORDER [ECF 3666]**

27 This Document Relates to:

28 *Jane Doe LS 98 v. Uber Technologies,
Inc., et al., No. 3:23-cv- 05412-CRB*

*Jane Doe LS 326 v. Uber Technologies,
Inc., et al., No. 3:23-cv- 05415-CRB*

*Jane Doe LS 245 v. Uber Technologies,
Inc., et al., No. 3:23-cv- 05944-CRB*

*T.W. v. Uber Technologies, Inc., et al.,
No. 3:24-cv- 00559-CRB*

*P.K. v. Uber Technologies, Inc., et al.,
No. 3:24-cv- 00572-CRB*

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 *D.P. v. Uber Technologies, Inc., et al.,*
2 *No. 3:24-cv- 04449-CRB*

3 *Jane Roe CL 16 v. Uber Technologies,*
4 *Inc., et al., No. 3:24-cv-04837-CRB*

5 *Jane Roe CL 24 v. Uber Technologies,*
6 *Inc., et al., No. 3:24-cv- 05536-CRB*

7 *Jane Roe CL 34 v. Uber Technologies,*
8 *Inc., et al., No. 3:24-cv- 05696-CRB*

9 *Jane Roe CL 36 v. Uber Technologies,*
10 *Inc., et al., No. 3:24-cv- 05720-CRB*

11 *Jane Roe CL 37 v. Uber Technologies,*
12 *Inc., et al., No. 3:24-cv- 05728-CRB*

13 *Jane Roe CL 38 v. Uber Technologies,*
14 *Inc., et al., No. 3:24-cv- 05729-CRB*

15 *Jane Roe CL 42 v. Uber Technologies,*
16 *Inc., et al., No. 3:24-cv- 05740-CRB*

17 *Jane Roe CL 43 v. Uber Technologies,*
18 *Inc., et al., No. 3:24-cv- 05741-CRB*

19 *Jane Roe CL 48 v. Uber Technologies,*
20 *Inc., et al., No. 3:24-cv- 05810-CRB*

21 *Jane Roe CL 53 v. Uber Technologies,*
22 *Inc., et al., No. 3:24-cv- 05831-CRB*

23 *Jane Roe CL 56 v. Uber Technologies,*
24 *Inc., et al., No. 3:24-cv- 05837-CRB*

25 *Jane Doe LS 268 v. Uber Technologies,*
26 *Inc., et al., No. 3:24-cv- 05910-CRB*

27 *Jane Roe CL 65 v. Uber Technologies,*
28 *Inc., et al., No. 3:24-cv- 06189-CRB*

Jane Roe CL 70 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 06863-CRB

Jane Roe CL 71 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 06864-CRB

1 *Jane Roe CL 76 v. Uber Technologies,*
2 *Inc., et al., No. 3:24-cv- 07569-CRB*

3 *Jane Roe CL 77 v. Uber Technologies,*
4 *Inc., et al., No. 3:24-cv- 07571-CRB*

5 *Jane Roe CL 78 v. Uber Technologies,*
6 *Inc., et al., No. 3:24-cv- 07584-CRB*

7 *Jane Roe CL 79 v. Uber Technologies,*
8 *Inc., et al., No. 3:24-cv- 07857-CRB*

9 *A.J. v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv- 07929-CRB*

11 *A.R. v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv- 08177-CRB*

13 *Jane Roe CL 81 v. Uber Technologies,*
14 *Inc., et al., No. 3:24-cv- 08521-CRB*

15 *Jane Roe CL 83 v. Uber Technologies,*
16 *Inc., et al., No. 3:24-cv- 08525-CRB*

17 *Jane Roe CL 84 v. Uber Technologies,*
18 *Inc., et al., No. 3:24-cv- 08526-CRB*

19 *Jane Roe CL 85 v. Uber Technologies,*
20 *Inc., et al., No. 3:24-cv- 08754-CRB*

21 *Jane Roe CL 86 v. Uber Technologies,*
22 *Inc., et al., No. 3:24-cv- 08756-CRB*

23 *K.J. v. Uber Technologies, Inc., et al.,*
24 *No. 3:24-cv- 09059-CRB*

25 *Jane Roe CL 88 v. Uber Technologies,*
26 *Inc., et al., No. 3:24-cv- 09145-CRB*

27 *Jane Doe LS 546 v. Uber Technologies,*
28 *Inc., et al., No. 3:24-cv- 09186-CRB*

G.C. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-09195-CRB

Jane Doe LS 547 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 09208-CRB

Jane Doe LS 548 v. Uber Technologies,

1 *Inc., et al., No. 3:24-cv- 09211-CRB*

2 *Jane Roe CL 91 v. Uber Technologies,*
3 *Inc., et al., No. 3:24-cv- 09235-CRB*

4 *Jane Roe CL 92 v. Uber Technologies,*
5 *Inc., et al., No. 3:24-cv- 09237-CRB*

6 *Jane Roe CL 93 v. Uber Technologies,*
7 *Inc., et al., No. 3:24-cv- 09549-CRB*

8 *Jane Roe CL 98 v. Uber Technologies,*
9 *Inc., et al., No. 3:25-cv- 00853-CRB*

10 *B.M. v. Uber Technologies, Inc., et al.,*
11 *No. 3:25-cv- 00982-CRB*

12 *Jane Roe CL 101 v. Uber Technologies,*
13 *Inc., et al., No. 3:25-cv- 01118-CRB*

14 *Jane Roe CL 102 v. Uber Technologies,*
15 *Inc., et al., No. 3:25-cv- 01120-CRB*

16 *Jane Doe LS 550 v. Uber Technologies,*
17 *Inc., et al., No. 3:25-cv- 01327-CRB*

18 *Jane Roe CL 103 v. Uber Technologies,*
19 *Inc., et al., No. 3:25-cv- 01347-CRB*

20 *Jane Roe CL 105 v. Uber Technologies,*
21 *Inc., et al., No. 3:25-cv- 01349-CRB*

22 *Jane Roe CL 107 v. Uber Technologies,*
23 *Inc., et al., No. 3:25-cv- 01470-CRB*

24 *Jane Doe LS 553 v. Uber Technologies,*
25 *Inc., et al., No. 3:25-cv- 01493-CRB*

26 *Jane Roe CL 109 v. Uber Technologies,*
27 *Inc., et al., No. 3:25-cv- 01652-CRB*

28 *Jane Roe CL 110 v. Uber Technologies,*
Inc., et al., No. 3:25-cv- 01653-CRB

Jane Doe LS 554 v. Uber Technologies,
Inc., et al., No. 3:25-cv- 01693-CRB

Jane Roe CL 114 v. Uber Technologies,
Inc., et al., No. 3:25-cv- 01942-CRB

1 *K.G. v. Uber Technologies, Inc., et al.,*
2 *No. 3:25-cv- 01962-CRB*

3 *TA.W. v. Uber Technologies, Inc., et al.,*
4 *No. 3:25-cv- 01967-CRB*

5 *Jane Roe CL 118 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv- 02132-CRB*

7 *Jane Roe CL 119 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv- 02133-CRB*

9 *Jane Roe CL 122 v. Uber Technologies,*
10 *Inc., et al., No. 3:25-cv- 02138-CRB*

11 *Jane Doe LS 580 v. Uber Technologies,*
12 *Inc., et al., No. 3:25-cv- 02460-CRB*

13 *Jane Roe CL 126 v. Uber Technologies,*
14 *Inc., et al., No. 3:25-cv- 02495-CRB*

15 *Jane Roe CL 127 v. Uber Technologies,*
16 *Inc., et al., No. 3:25-cv- 02496-CRB*

17 *Jane Roe CL 130 v. Uber Technologies,*
18 *Inc., et al., No. 3:25-cv- 02742-CRB*

19 *Jane Roe CL 131 v. Uber Technologies,*
20 *Inc., et al., No. 3:25-cv- 02743-CRB*

21 *Jane Roe CL 135 v. Uber Technologies,*
22 *Inc., et al., No. 3:25-cv- 02747-CRB*

23 *Jane Doe LS 582 v. Uber Technologies,*
24 *Inc., et al., No. 3:25-cv- 02792-CRB*

25 *Jane Doe LS 584 v. Uber Technologies,*
26 *Inc., et al., No. 3:25-cv- 02806-CRB*

27 *Jane Roe CL 137 v. Uber Technologies,*
28 *Inc., et al., No. 3:25-cv- 03036-CRB*

Jane Roe CL 138 v. Uber Technologies,
Inc., et al., No. 3:25-cv- 03137-CRB

Jane Doe LS 589 v. Uber Technologies,
Inc., et al., No. 3:25-cv- 03216-CRB

Jane Doe LS 590 v. Uber Technologies,

1 *Inc., et al., No. 3:25-cv- 03217-CRB*

2 *Jane Roe CL 139 v. Uber Technologies,*
3 *Inc., et al., No. 3:25-cv- 03255-CRB*

4 *Jane Roe CL 142 v. Uber Technologies,*
5 *Inc., et al., No. 3:25-cv- 03258-CRB*

6 *Jane Doe LS 592 v. Uber Technologies,*
7 *Inc., et al., No. 3:25-cv- 03266-CRB*

8 *Jane Doe LS 593 v. Uber Technologies,*
9 *Inc., et al., No. 3:25-cv- 03269-CRB*

10 *Jane Doe LS 594 v. Uber Technologies,*
11 *Inc., et al., No. 3:25-cv- 03274-CRB*

12 *T.G. v. Uber Technologies, Inc., et al., No.*
13 *3:25-cv- 03261-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's August 8, 2025 Order.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am a member in good standing of the Bars of the State of California, the State of New York, and the District of Columbia. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

3. On August 8, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with Court Orders to provide a complete and verified Plaintiff Fact Sheet within 14 days of the Order. ECF 3666. The Order therefore compelled compliance by each Plaintiff subject to the Order by August 22, 2025.

4. The Court also ordered counsel for Uber to submit a declaration within 21 days of the Order (*i.e.*, by August 29, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. On August 25, 2025, counsel for Uber reviewed MDL Centrality to determine which Plaintiffs subject to the Court's August 8, 2025 Order failed to provide a Plaintiff Fact Sheet as ordered by the Court.

6. Based on counsel for Uber's review of MDL Centrality, the following Plaintiffs have failed to provide a Plaintiff Fact Sheet as ordered by the Court:

MDLC ID	Case Name	Case Number	Plaintiff Firm
1179	Jane Doe LS 98	3:23-cv-05412	Levin Simes
1180	Jane Doe LS 326	3:23-cv-05415	Levin Simes
1199	Jane Doe LS 245	3:23-cv-05944	Levin Simes
3501	D.P. (3)	3:24-cv-04449	Meyer Wilson
1778	Jane Roe CL 16	3:24-cv-04837	Cutter Law
2082	Jane Roe CL 24	3:24-cv-05536	Cutter Law
2093	Jane Roe CL 34	3:24-cv-05696	Cutter Law
2095	Jane Roe CL 36	3:24-cv-05720	Cutter Law

MDLC ID	Case Name	Case Number	Plaintiff Firm
2096	Jane Roe CL 37	3:24-cv-05728	Cutter Law
2103	Jane Roe CL 42	3:24-cv-05740	Cutter Law
2104	Jane Roe CL 43	3:24-cv-05741	Cutter Law
2110	Jane Roe CL 48	3:24-cv-05810	Cutter Law
2115	Jane Roe CL 53	3:24-cv-05831	Cutter Law
2118	Jane Roe CL 56	3:24-cv-05837	Cutter Law
2305	Jane Doe LS 268	3:24-cv-05910	Levin Simes
2492	Jane Roe CL 65	3:24-cv-06189	Cutter Law
2600	Jane Roe CL 71	3:24-cv-06864	Cutter Law
2681	Jane Roe CL 77	3:24-cv-07571	Cutter Law
2682	Jane Roe CL 78	3:24-cv-07584	Cutter Law
2683	Jane Roe CL 79	3:24-cv-07587	Cutter Law
3470	A.R. (3)	3:24-cv-08177	Meyer Wilson
2702	Jane Roe CL 81	3:24-cv-08521	Cutter Law
2704	Jane Roe CL 83	3:24-cv-08525	Cutter Law
2705	Jane Roe CL 84	3:24-cv-08526	Cutter Law
2713	Jane Roe CL 85	3:24-cv-08754	Cutter Law
2714	Jane Roe CL 86	3:24-cv-08756	Cutter Law
2727	K.J. (2)	3:24-cv-09059	Wagstaff Law Firm
2778	Jane Roe CL 88	3:24-cv-09145	Cutter Law
3471	G.C. (2)	3:24-cv-09195	Meyer Wilson
2755	Jane Doe LS 547	3:24-cv-09208	Levin Simes
2756	Jane Doe LS 548	3:24-cv-09211	Levin Simes
2781	Jane Roe CL 91	3:24-cv-09235	Cutter Law
2782	Jane Roe CL 92	3:24-cv-09237	Cutter Law
2830	Jane Roe CL 98	3:25-cv-00853	Cutter Law
2948	Jane Roe CL 101	3:25-cv-01118	Cutter Law
2949	Jane Roe CL 102	3:25-cv-01120	Cutter Law
2925	Jane Doe LS 550	3:25-cv-01327	Levin Simes
3250	Jane Roe CL 107	3:25-cv-01470	Cutter Law
2989	Jane Doe LS 553	3:25-cv-01493	Levin Simes
3252	Jane Roe CL 109	3:25-cv-01652	Cutter Law
3253	Jane Roe CL 110	3:25-cv-01653	Cutter Law
2990	Jane Doe LS 554	3:25-cv-01693	Levin Simes
3257	Jane Roe CL 114	3:25-cv-01942	Cutter Law
3063	K.G. (2)	3:25-cv-01962	Wagstaff Law Firm
3065	TA.W.	3:25-cv-01967	Wagstaff Law Firm
3262	Jane Roe CL 119	3:25-cv-02133	Cutter Law
3265	Jane Roe CL 122	3:25-cv-02138	Cutter Law
3087	Jane Doe LS 580	3:25-cv-02460	Levin Simes
3273	Jane Roe CL 130	3:25-cv-02742	Cutter Law
3178	Jane Doe LS 582	3:25-cv-02792	Levin Simes
3176	Jane Doe LS 584	3:25-cv-02806	Levin Simes
3280	Jane Roe CL 137	3:25-cv-03036	Cutter Law

MDLC ID	Case Name	Case Number	Plaintiff Firm
3239	Jane Doe LS 589	3:25-cv-03216	Levin Simes
3240	Jane Doe LS 590	3:25-cv-03217	Levin Simes
3282	Jane Roe CL 139	3:25-cv-03255	Cutter Law
3242	Jane Doe LS 592	3:25-cv-03266	Levin Simes
3243	Jane Doe LS 593	3:25-cv-03269	Levin Simes
3244	Jane Doe LS 594	3:25-cv-03274	Levin Simes
3324	T.G.	3:25-cv-03621	Wagstaff Law Firm

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2025, in Los Angeles, California.

/s/Michael B. Shortnacy
Michael B. Shortnacy